

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

KODY RYAN KELSO,
[DOB 2-22-1991]

Defendant.

No. 21-3082-01-CR-S-SRB

COUNTS 1 & 2

18 U.S.C. §§ 2251(a) and (e)

NLT 15 Years Imprisonment

NMT 30 Years Imprisonment

NMT \$250,000 Fine

NLT 5 Years, or Life, Supervised Release

Class B Felony

COUNTS 3 & 4

18 U.S.C. § 2422(b)

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$250,000 Fine

NLT 5 Years, or Life, Supervised Release,

Class A Felony

COUNT 5

18 U.S.C. §§ 2252(a)(2) and (b)(1)

NLT 5 Years Imprisonment

NMT 20 Years Imprisonment

NMT \$250,000 Fine

NLT 5 Years, or Life, Supervised Release

Class C Felony

Restitution

\$100 Special Assessment

\$5,000 JVT A Special Assessment

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

(Sexual Exploitation of a Child)

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(e)

Beginning on an unknown date, but as early as January 1, 2021, and continuing through June 16, 2021, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **KODY RYAN KELSO**, did, and attempted to, employ, use, persuade, induce, entice, and coerce a minor, “CCbutterfly,” to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was intended to be transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 2

(Sexual Exploitation of a Child)

18 U.S.C. § 2251(a)

18 U.S.C. § 2252(e)

On or about May 18, 2021, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **KODY RYAN KELSO**, did, and attempted to, employ, use, persuade, induce, entice, and coerce a minor, “Madison Harris,” to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was intended to be transported in interstate commerce, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 3

(Coercion and enticement)

18 U.S.C. § 2422(b)

Beginning on an unknown date, but as early as January 1, 2021, and continuing through June 16, 2021, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **KODY RYAN KELSO**, did use any facility and

means of interstate commerce, that is, the internet and the cellular telephone network, to knowingly persuade, induce, and entice “CCbutterfly,” an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be criminally charged under state law, which prohibits any person from having sexual intercourse and deviate sexual intercourse with another person who is less than fourteen years of age, all in violation of Title 18, United States Code, Section 2422(b).

COUNT 4

(Coercion and enticement)

18 U.S.C. § 2422(b)

Beginning on an unknown date, but as early as October 11, 2020, and continuing through October 13, 2020, said dates being approximate, in Greene County, in the Western District of Missouri, and elsewhere, the defendant, **KODY RYAN KELSO**, did use any facility and means of interstate commerce, that is, the internet and the cellular telephone network, to knowingly persuade, induce, and entice “iku Kuroki,” an individual who had not attained the age of 18 years, to engage in any sexual activity for which any person could be criminally charged under state law, which prohibits any person from having sexual intercourse and deviate sexual intercourse with another person who is less than fourteen years of age, all in violation of Title 18, United States Code, Section 2422(b).

COUNT 5

(Receipt & Distribution of Child Pornography)

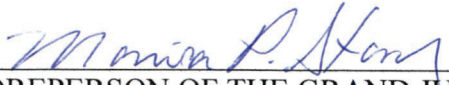
18 U.S.C. § 2252(a)(2)


18 U.S.C. § 2252(b)(1)

Beginning on an unknown date, but as early as October 1, 2020, and continuing through June 16, 2021, said dates being approximate, in Greene County, in the Western District of Missouri, the defendant, **KODY RYAN KELSO**, knowingly received and distributed any

visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

A TRUE BILL


FOREPERSON OF THE GRAND JURY


STEPHANIE L. WAN
Assistant United States Attorney
Missouri Bar #58918

Dated: 12-14-2021
Springfield, Missouri